

Jeffrey John Doering # 340398
Name and Prisoner/Booking Number

A.S.P.C. Kingman / Cerbat Unit
Place of Confinement

P.O. Box 3009
Mailing Address

Kingman, Az. 86402
City, State, Zip Code

(Failure to notify the Court of your change of address may result in dismissal of this action.)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Jeffrey John Doering
(Full Name of Plaintiff)

Plaintiff,

v.

(1) Sheriff Mark Lamb
(Full Name of Defendant)

(2) Sheriff Deputy Damico

(3) "And Others"

(4) _____

Defendant(s).

☒ Check if there are additional Defendants and attach page 1-A listing them.

CASE NO. CV-20-00404-PHX-SMB-CDB
(To be supplied by the Clerk)

**CIVIL RIGHTS COMPLAINT
BY A PRISONER
Jury Trial Demanded!**

- ☒ Original Complaint
☐ First Amended Complaint
☐ Second Amended Complaint

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983

☐ 28 U.S.C. § 1331; *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971).

☐ Other: _____

2. Institution/city where violation occurred: Pinal County Jail

Additional Defendants

(3) Sheriff Deputy Unknown "Captain"

(4) Sheriff Deputy Unknown

(5) Sheriff Deputy Unknown

(6) Sheriff Deputy Unknown

(7) Medical Staff Unknown "Nurse"

B. DEFENDANTS

1. Name of first Defendant: Mark Lamb. The first Defendant is employed as: Sheriff at Pinal County Jail.
(Position and Title) (Institution)
2. Name of second Defendant: Damico. The second Defendant is employed as: Sheriff Deputy at Pinal County Jail.
(Position and Title) (Institution)
3. Name of third Defendant: Unknown. The third Defendant is employed as: Sheriff Deputy "Captain" at Pinal County Jail.
(Position and Title) (Institution)
4. Name of fourth Defendant: Unknown. The fourth Defendant is employed as: Sheriff Deputy at Pinal County Jail.
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☐ Yes ☐ No
2. If yes, how many lawsuits have you filed? _____. Describe the previous lawsuits:
 - a. First prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - b. Second prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - c. Third prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

Defendants Continued

1
2
3 5. Name of fifth Defendant Unknown The
4 fifth Defendant is employed as Sheriff Deputy
5 at Pinal County Jail
6

7 6. Name of Sixth Defendant Unknown The
8 Sixth Defendant is employed as Sheriff Deputy
9 at Pinal County Jail
10

11 7. Name of Seventh Defendant Unknown The
12 Seventh Defendant is employed as Nurse The
13 at Pinal County Jail
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D. CAUSE OF ACTION**COUNT I**

1. State the constitutional or other federal civil right that was violated: 14th Amendment

2. **Count I.** Identify the issue involved. Check **only one**. State additional issues in separate counts.

- | | | | |
|---|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input checked="" type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Count I. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Sheriff Mark Lamb, though not present at time of vicious assault upon Mr. Jeffrey Doering, by his deputies on approximately 4/24/2018.

Sheriff Mark Lamb, acting under the color of state law, deprived Mr. Doering of his federal rights. His direct liability involves inaction in the training and close supervision and control of his subordinates who committed these heinous and wrongful acts. Sheriff Lamb, is expected to have set policy, wrote regulations or even gave orders to subordinates who felt comfortable in carrying out this beating knowing that there would be no consequences for doing so, and there wasn't! Sheriff Lamb, should have known about extremely large payout to (Mountain Vista Hospital) concerning life saving measures performed on Mr. Doering. Nonetheless, Sheriff Lamb, must be kept as a defendant even without direct evidence tying him to this crime or personal involvement for the purpose of (Discovering additional defendants, Medical staff, Deputies, Policies) that was being enforced that contributed, unprovoked attack on Mr. Doering.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

Serious visible scarring, Terror of instant un-expected death, Loss of all property, Nightmares Depression, Anxiety, Psychological trauma, Unable to hold gainful employment, ungoing physical pain from incident, Shamed by deputies as though he deserved this beating

5. **Administrative Remedies:**

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- Did you submit a request for administrative relief on Count I? ☐ Yes ☒ No
- Did you appeal your request for relief on Count I to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. After coming out of coma, removed from ICU. Then being told by Doctors that it's a miracle he had survived (see Attachment)

Count 1. Continued.

Administrative Remedies Continued.

1
2
3 After being brought back from the dead! After having no
4 recollect of where he was nor how he got there and
5 what happened to him or even how many days had
6 actually passed by. All of a sudden he slowly regained
7 his rememory of this very vicious assault by the
8 Sheriff deputies. A great fear came over him that
9 Sheriff deputies would come back to finish the job
10 Killing him this time, then the pain from what had taken
11 place, kicked in. Fear would not allow him to remain there!

12
13 After days went by, regaining some strength, people who
14 were concerned about his safety, would help him to free
15 himself from all the medical hard ware and left the
16 hospital where he was driven to "Washington State"
17 where he would eventually check into the "Sacred Heart
18 Recovery & Rehabilitation Hospital" For additional
19 treatment. "Note: he has (Medical Records) from Hospital"

20
21 Therefore; Mr. Doering, wasn't able to request administrative
22 relief from the county jail, nor was able to file any appeals.
23 He was no longer in the state for this process to play out
24 due to the fear of another unprovoked attack by deputies
25 who he remembers boasting about knocking him out cold,
26 before actually went to an un-conscious state of being

COUNT II

1. State the constitutional or other federal civil right that was violated: 8th Amendment

2. **Count II.** Identify the issue involved. Check **only one**. State additional issues in separate counts.

- | | | | |
|---|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input checked="" type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Count II. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Sheriff Deputy Damico, acting under the color of state law deprived Mr. Doering of his Federal Rights when he personally participated in this very senseless and unprovoked beating of Mr. Jeffrey Doering, on approximately 4/24/2018. Sheriff Deputy Damico, believed to be apart of 5 to 6 deputies who rapidly responded to this situation involving Mr. Doering.

Mr. Doering, who was in the (Jail) being housed in (H-Block) was on the floor by the (Bubble) holding his stomach crying out in unrelenting agonizing abdominal pain in front of the nurse when Officer Damico, an unknown Captain and others approached him demanding that he stop resisting, but he wasn't resisting he was just in excruciating pain! Just minutes prior to this confrontation by Sheriff Deputies.

Mr. Doering went down in his cell, Mr. Doering was throwing up repeatedly and bleeding out the rectum! (10 Men) who were in the cell with Mr. Doering, repeatedly yell (Man Down, Man Down).
(see Attachment)

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

Serious Visible Scaring, Terror of instant unexpectant death, Loss of all property, Nightmares, Depression, Unable To hold gainful employment, Anxiety, Psychological trauma, Physical pain from incident, Shamed by deputies as though he deserved this beating.

5. **Administrative Remedies.**

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- Did you submit a request for administrative relief on Count II? ☐ Yes ☒ No
- Did you appeal your request for relief on Count II to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. See Count-1 and Continuation page 3-A which goes into great detail why administrative remedies were not sought!

Count II Continued.

1 After a number of pleas for help was totally being purposely
2 ignored Mr. Doering, would gather what little strength he
3 had once the Cell Door was finally opened, in walked to the
4 bubble in which he would fall to the ground again after
5 talking to the nurse, crying of being in pain holding stomach.

6
7 What happened next is just shocking to the conscious, malicious-
8 ly and sadistically to cause harm. Officers Domico, and
9 unknown others repeatedly and senselessly (started
10 kicking Mr. Doering, in his back, and his stomach
11 and to his head) Mr. Doering, wanted them to stop,
12 but they wouldn't, they continued with this savage
13 assault kicking him to the head, back and stomach
14 until they perceived that Mr. Doering, was un-conscious
15 In fact, he remembers before actually losing conscious-
16 ness hearing one officer saying to the other (I think
17 you knocked him out) Just who does something like this?

18
19 Mr. Doering, unconscious and not realizing how much time had
20 lapsed, woke up in a restraint chair, after waking up
21 he was quickly removed to a different area where he
22 was stripped naked, then put in a (Turtle Suit) with no
23 under garments, then thrown into an empty cell placed
24 on (Suicide Watch)

25
26 Approximately 2:00 AM the very next day in (cell G-303)

Count II Continued.

1 A deputy just happened to walk by peeking into the
2 cell where he noticed Mr. Doering, laying on the floor
3 his body appearing to be lifeless, where he defecated
4 feces unto himself, where also he had just threw up
5 again black blood, and blood profusely flowing from
6 within his anus, where he laid and around him.

7
8 It was during this time that Mr. Doering, was floating in
9 and out of consciousness, when he noticed the very same
10 deputies who assaulted him, with this very same
11 nurse present, strapping him unto a board. Then (EMS)
12 would soon arrive taking him to (Mountain Vista Medical
13 ER) Approximately (25 hours later) while at the hospital
14 while in dire straights, Mr. Doering was finally told that
15 he was (Going to need emergency surgery in order
16 to save his life.) He was dying!

17
18 Mr. Doering, (who would in fact die during life saving surgery
19 from what he was told by doctors at hospital who brought
20 him back). During this time Mr. Doering, was placed in a
21 (Medical Induced Coma, given 31 units of blood to get his
22 internal organ in which blood flows to clot to stop the in-
23 ternal bleeding) Approximate (12-Days) later Mr. Doering,
24 woke up from Coma, tubes sticking out from his stomach.
25 Jeffrey Doering Junior, would call the hospital on this date
26 and was told by the doctor in charge of Mr. Doering's
27 care that, his dad wasn't expected to make it through the night.

Count II Continued.

1 After Mr. Doering woke up, not knowing what happened or
 2 why he was there, nor how many days had went by, nor why
 3 he was hooked up to so many machines, couldn't move hands
 4 neck or feet, totally paralyzed. A group of doctors were
 5 standing near by (Mouths wide open, Shocked That He Was Awake
 6 And Survived This Ordeal, One Told Another Doctor That It's A Mira-
 7 cul That He Made It)

8
 9 Soon Mr. Doerings, memory would come back of guards senseless
 10 ly beating him, serious un-renting pain from the beating
 11 surgery would overwhelm him, he then started crying pro-
 12 fusely of being in agonizing pain for his mother, who would
 13 eventually visit him and just (could not believe what
 14 Sheriff deputies at Pinal County Jail had done to her son)
 15 immediately took pictures of what they had done to him
 16 tried to console him and stop him from crying. (Neither the
 17 Doctors On Scene, Mr. Doerings Mother, Mr. Doering, Himself Be-
 18 lieved That He Would survive The Days To Come (So, A
 19 Priest Was Called In To Pray For Him))

20
 21 Mr. Doering, would survive, slowly started regaining some strength
 22 The lingering fear that Sheriff Deputies would return to
 23 kill him troubled Mr. Doering & loved ones simply because,
 24 nothing they could say could justify what they sadistically
 25 did to him, nor could they allow this factual and un-im-
 26 aginable story to be told, Mr. Doering would leave the hospital
 27 and the State of Az. Seeking additional care in a Washington St. Hospital.

COUNT III

1. State the constitutional or other federal civil right that was violated: 8th Amendment

2. **Count III.** Identify the issue involved. Check **only one**. State additional issues in separate counts.

- | | | | |
|---|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input checked="" type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Count III. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Sheriff Deputy (UNKNOWN) Captain, acting under the color of State law, deprived Mr. Doering of his Federal Rights, when he personally responded and participated in the senseless and unprovoked attack on Mr. Jeffrey Doering on approximately 4/24/2018. Captain yelled out loud to Mr. Doering, (I'm going to taze you, if you don't stop resisting) Mr. Doering wasn't resisting, he was just on the ground wailing out loud of being in agonizing pain, while holding on to his abdomen. Captain is grossly negligent in the supervision of subordinates.

Mr. Doering doesn't know if this Captain tazed him because he was soon knocked out, unconscious due to the savage beating that took place by the Captain's subordinates. The Captain, had the power to stop this, but encouraged it, excited it, condoned it, by doing absolutely nothing to stop it as deputies unknown put the boots to Mr. Doering, kicking him over and over again to the head, back, stomach. It's believed that Captain failed to report incident or falsified report of incident which evidence of deliberate indifference.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

Serious Visible Scaring, Terror of instant unexpected death, Loss of all property, Nightmares, Depression, Unable to hold gainful employment, Anxiety, Psychological trauma Physical pain from incident, Shamed by deputies as though he deserved this beating.

5. **Administrative Remedies.**

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- Did you submit a request for administrative relief on Count III? ☐ Yes ☒ No
- Did you appeal your request for relief on Count III to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. See Count-I and Continuation page 3-A, which goes into great detail as to why administrative remedies were not sought.

If you assert more than three Counts, answer the questions listed above for each additional Count on a separate page.

Count IV

1 State the Constitutional or other Federal
2 Civil right that was violated: 8th Amendment

3
4 **Count IV.** Identify issue involved. Excessive Force By An Officer

5 6 Supporting Facts.

7 Sheriff Deputy (Unknown) acting under the color of State
8 law, deprived Mr. Jeffrey Doering, of his Federal Rights
9 when he maliciously and sadistically caused harm to Mr.
10 Doering, in an unprovoked attack with 5 to 6 other
11 Sheriff Deputies, who continuously kicked him in the
12 (back, head, stomach) until he was unconscious
13 on approximately 4/24/2018. Use of force by un-
14 known Sheriff Deputy was intended to punish Mr.
15 Doering, was not merely incident of some other legiti-
16 mate purpose and the resulting injury was more than
17 de minimis. What was done by this Officers conduct
18 shocks the conscience, extremely cruel and totally
19 un-necessary, that caused the un-timely death of Mr.
20 Doering, who was miraculously brought back to life.

21 22 Administrative Remedies.

23 See Count-1 and Continuation page 3-A, which goes into
24 great detail as to why administrative remedies were
25 not sought.

26
27 **Injury.** Serious Visible Scarring, Terror of instant unexpected death, Depression,
28 Anxiety, Nightmares, Psychological trauma, Loss of all property, Pain from incident.
5-A.

Count V.

1 State the Constitutional or other Federal
 2 Civil Right that was Violated: 8th Amendment

3
 4 **Count V. Identify issue involved.** Excessive Force By An Officer

5
 6 **Supporting Facts.**

7 Sheriff Deputy (Unknown) acting under color of state law
 8 deprived Mr. Jeffrey Doering, of his Federal Rights on
 9 approximately 4/24/2018, when he maliciously and
 10 sadistically caused harm to Mr. Doering in an unprovoked
 11 attack with 5 to 6 other Sheriff Deputies. Vicious
 12 attack was extremely cruel. This unknown deputy
 13 had reason to know of facts creating a high degree of
 14 risk of physical harm and acted in a conscious disre-
 15 gard or indifference to that risk when he continuously
 16 kicked Mr. Doering to the (back, head, stomach) demon-
 17 strating a callous indifference. Assault served no
 18 penological justification. Force was "Wanton" by
 19 this deputy, since there was absolutely no perceived need
 20 for it, nor can excessive force be justified. Cruel & unusual!

21
 22 **Administrative Remedies.**

23 See Count-I and Continuation page 3-A, which goes into great detail
 24 as to why administrative remedies were not sought.

25
 26 **Injury.** Serious Visible Scarring, Terror of instant Unexpectant death, Night
 27 mares, Anxiety, Psychological trauma, Unable to hold gainful employment,
 28 Depression, Loss of all property, Shamed by deputies as though he deserved beating.

Count VI.

1 State the Constitutional or other federal
2 Civil Right that was violated: 8th Amendment

3

4 **Count VI.** Identify issue involved. Excessive Force By An Officer

5

6 Supporting Facts.

7 Sheriff Deputy (Unknown) acting under the Color of State law
8 deprived Mr. Jeffrey Doering, of his Federal Rights on 4/24/18,
9 approximately. This unknown deputy and 5 to 6 others
10 viciously, maliciously and sadistically caused a great
11 deal of harm to Mr. Doering, by kicking Mr. Doering,
12 to the (head, back, stomach) actions by this officer
13 who was believed to be acting in concert with others
14 were extremely cruel and unimaginable. Force used
15 by this officer was un-reasonable, callous and un-nec-
16 essarily excessive, putting Mr. Doering's life at risk who
17 died during life saving surgery and miraculously brought
18 back due to very savage beating this deputy had done.

19

20 Administrative Remedies.

21 See Count-1 and Continuation page 3-A, which goes into
22 great detail as to why administrative remedies were not sought.

23

24 **Injury.** Serious Visible Scarring, Terror of instant unexpected death, Night
25 mares, Anxiety, Depression, Psychological trauma, Unable to hold gainful em-
26 ployment, Loss of all property, Pain from incident, Shamed like he deserved beating

27

28

Count VII

1 State Constitutional or other federal
2 Civil right that was violated 8th Amendment.

3
4 **Count VII. Identify issue involved.** Medical Care

5
6 **Supporting Facts.**

7 Nurse (Unknown) was deliberately indifferent to Mr.
8 Doering, who provided this nurse with (Stool Sample) that had
9 obvious blood in it on Approximately 4/24/2018, after (3) days
10 of complaining about throwing up and bleeding out the
11 rectum with absolutely no one willing to listen. On this
12 day after going down in his cell, shortly after words muster-
13 ing enough strength to meet her at the (Bubble) This nurse
14 took his (Blood Pressure, told him he was going to be fine) This
15 very same nurse witnessed senseless beating that soon followed
16 after Mr. Doering, fell to the floor in her presense, she knew he
17 was beaten unconscious, needing a doctors care, but failed
18 to act or report abuse by deputies! Omission by nurse
19 was sufficiently harmful because, Mr. Doering would soon
20 require (Emergency Surgery To Save His Life)

21
22 **Administrative Remedies**

23 See Count-1 and Continuation page 3-A, which goes into great detail
24 as to why administrative remedies were not sought

25
26 **Injury.** Visible Serious Scoring, Abandonment, Terror of instant unexpected
27 death, Anxiety, Depression, Psychological trauma, Nightmares, Failure to
28 administer immediate medical attention, Call doctor, Loss of all property, Negligence.

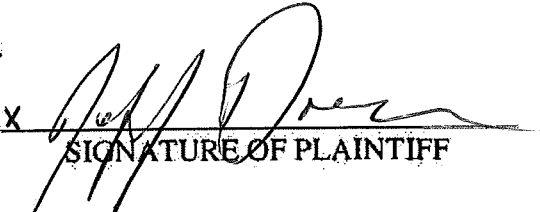
E. REQUEST FOR RELIEF

State the relief you are seeking:

Plaintiff believes that defendant quickly harbored an ill will towards him by there blatant non-caring actions, a reckless disregard for his health. All Mr. Doering wanted the defendants to do was help him to stop the pain! Prior to vicious beating, he went (3) days complaining about discomfort in abdomen, without anyone in the jail including nurse was willing to listen to him! Mr. Doering believes they got tired of him complaining and that's when Sheriff Deputies acting as a (See Attachment)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2/10/2020
DATE

X 
SIGNATURE OF PLAINTIFF

David Leary #65798 Inmate
(Name and title of paralegal, legal assistant, or
other person who helped prepare this complaint)

(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space, you may attach no more than fifteen additional pages. But the form must be completely filled in to the extent applicable. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages.

Request For Relief Continued.

Unit and in concert, putting the boots to Mr. Doering's back, head, and stomach to silence him and boy did they, taking no consideration into the fact that they could kill him, in which he died while surgery was being performed to save him and wasn't expected to survive the night after they brought him back from death, but he did. (If wrongs are allowed to go un-compensated, ill will and a blatant disregard for one's health and life will continue because, defendants will not have learned absolutely nothing from this, and continue in this illicit behavior) Mr. Doering, after regaining his consciousness promised the Sheriff Deputies and nurse that he wasn't going to let them get away with this, so now it has to be time that all involved in this very senseless, unprovoked, Callous and totally unnecessary cowardly act of violence, make it right by him. It's believed they are acting as a unit to cover events up!

Therefore, Mr. Jeffrey Doering is looking for (Compensatory Damages) of \$1,000,000.⁰⁰ (1-Million Dollars) from each and every defendant, which would send a very clear and loud message to this jail and the sheriff who's in charge of the jail and subordinates, that this type of reckless behavior is totally unacceptable and will not be tolerated, failing to supervise, correct, educate, oversee and reign in blatant misconduct, Corruption, that's infiltrated and permeated the Pinal County Jail.

(See Attachment) Grand Total \$7,000,000.⁰⁰

Request For Relief Continued

1 (Punitive Damages) of \$2,000,000.⁰⁰ (2-Million Dollars) from each
2 and every defendant (thats mean't to sting) and Compell correc-
3 tion, future oversight and respect for one's health and right to
4 life. Mr. Doering, still suffers from the pain and has re-occurring
5 nightmares from vicious assault, lost his ability to hold mean-
6 ingful employment. He lost everything he owned due to vul-
7 nerable medical state of being, someone created a (Fake-
8 P.O.A) Sold all he owned (House, Cars, Motor cycle, Trailer)
9 all former memories of his past life because of this or-
10 deal is completely gone! Note: Deputies were very arrogant
11 when they boasted about knocking Mr. Doering out. Grand Total
12 \$14,000,000.⁰⁰

13

14 Sheriff Deputies who committed these heinous, atrocious,
15 discriminating, disgusting, outrageous, Shameful and un-
16 lawful acts against Mr. Doering, did so without any
17 fears what so ever, of ever being held accountable, which
18 gives the impression that, they all have done this sort of
19 thing before and that Sheriff Mark Lamb, approved of
20 or, encouraged such conduct or, at the very least turn-
21 ed a blind eye to it therefore, condoning it.

22

23 Use of force wasn't applied in good faith, absolutely no
24 immediate threat of danger to the safety of deputies,
25 nor other inmates, other staff employed by the jail, nor
26 to Mr. Doering himself. Any attempt to justify a good
27 faith effort is removed by the fact that (see Attachment)

28

6-B.

Request For Relief Continued.

1 Mr. Doering was already down when 5 to 6 man rapid
2 response unit came. Nurse took his blood pressure, then
3 told him that he was going to be fine just before he went
4 down, cried out loud of being in unrelenting state of agony
5 of being in pain, in which unnecessary and unprovoked
6 beating by deputies would follow, that was totally unwarranted.
7 In due to the fact that he was later found in his cell
8 profusely bleeding out the mouth, rectum, and near death,
9 is believed to justify financial relief requested from all defendants
10 who either participated, stood by and did absolutely
11 nothing to stop it, refuse to report it, or falsified
12 report in an attempt to conceal it, or refused to offer medical
13 relief, attention, comfort, call a doctor, before and
14 immediately after vicious assault. **He Would Have Died In
15 His Cell, He Died At The Hospital, After Life Saving Surgery,
16 In Was Brought Back To Life!**

17 (Medical Bills, Past, Present And Future)

18 **(An Addition To Requested Relief)** Any potential Attorney Fees,
19 all related Court Fees, Filing Fees and Fees associated with
20 Civil Complaint Filing by Inmate representative and others
21 to be charged to defendants. Mr. Doering is also looking
22 forward to the Arrest & Prosecution and firing of all involved
23 in very brutal assault. By the Hon. Courts assistance
24 in this matter, would signal a very strong disclan
25 for this "New Norm" By the Sheriff, Pinal County Jail Deputies,
26 who after senseless beating, went on with there lives
27 as if it was just another normal day of doing business.

28 6-C.